REMARKS

I. Introduction

Claims 2-11 are pending and stand rejected. With this response, claims 2-8, 10, and 11 are amended, claim 9 is cancelled, and new claims 12-15 are added. Consequently, claims 2-8 and 10-15 are at issue. With the amendments, claims 10 and 15 are the only independent claims.

II. The Rejections

A. The §112 Rejection

Claim 10 was rejected under 35 U.S.C. §112 as being indefinite. This rejection is obviated for the reasons stated below.

B. The §103 rejections

Claims 2-8 and 10-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 4,401,895 to Petkovsek in view of U.S. Published Application No. 2003/0063715 to Peplinski. Claims 2-8 and 10-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Petkovsek in view of Peplinski and U.S. Patent No. 5,990,577 to Kamioka. Claims 2-8 and 10-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Petkovsek in view of Peplinski and U.S. Patent No. 6,642,632 to Lucas. Claim 9 was rejected under 35 U.S.C. §103(a) as being unpatentable over Petkovsek in view of Peplinski and U.S. Patent No. 5,884,328 to Furst. These rejections as they may apply to the claims presented herein are traversed for the reasons stated below.

III. The Pending claims are allowable

A. The §112 Rejection is Obviated

The Office Action rejected claim 10 because the phrase "substantially adjusted" was considered indefinite. This phrase has been removed from the claim. Consequently, it is submitted that this rejection to claim 10 is obviated.

B. The §103 Rejections are Traversed

(1) Claims 2-8 and 10-11 are not rendered obvious by Petkovsek and Peplinski

Petkovsek teaches supplying DC power to a load. As shown in FIG. 1 of Petkovsek (reproduced below for the convenience of the Examiner), a dc-to-dc up converter 20 is connected between a battery 18 and a power switch 14. When the main supply fails, voltage is drawn from the battery 18 and substantially increased by the dc-to-dc up converter 20 before it reaches the power switch 14 (and thereby the outputs 10c and 10d). The path from the battery 18 to the power switch 14 includes a diode D1 and the dc-to-dc up converter 20. As described by Petkovsek, the battery voltage is increased to a level of more than 240 volts by the dc-to-dc up converter 20. See Petkovsek, col. 4, lines 59-67. The diode D1 is not part of any external device powered by the Petkovsek system via the outputs 10c and 10d.

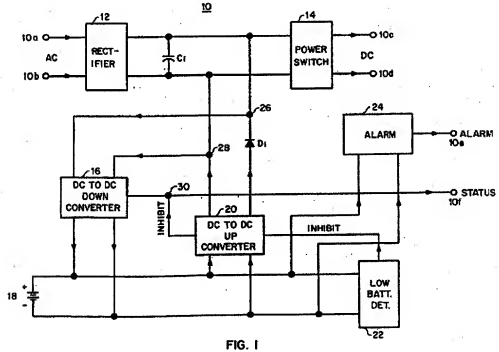
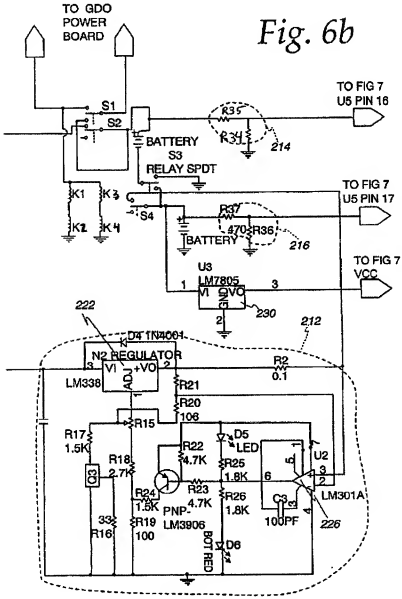


FIG. 1

As for the Peplinski reference, a system for supplying battery back-up power that is controlled by switches (i.e., switches S1, S2, S3, and S4) is described. See FIG. 6b of Peplinski reproduced below for the convenience of the Examiner. During ordinary operation of the garage door operator (no mains power failure), the batteries B1 and B2 are connected to the battery chargers 210 and 212 and this allows charging.



When the garage door operator experiences a loss of external power, this loss of power cycles relays K1, K2, K3, and K4 to operate the corresponding switches S1, S2, S3, and S4. In this situation, the batteries B1 and B2 are disconnected from the battery chargers 210 and 212. Switches S2 and S4 are switched to the open position to disconnect batteries B1 and B2 from their respective battery chargers 210 and 212. Then, back-up power is supplied to the garage door operator components. Switch S1 is closed to connect the batteries B1 and B2 to the garage door operator components and switch S3 is closed to connect the batteries B1 and B2 to each other so that they operate in series. See Peplinski, paragraphs 37-38. No isolation device is used within the Peplinski system.

Neither of the references teaches or suggests a movable barrier operator that includes an internal conductive path that is connected to a DC voltage supply and that this conductive path includes a unidirectional isolation device and an impedance element as recited in claim 10. Further, neither reference teaches or suggests that the movable barrier operator includes a first mating portion of a plug that is coupled to the internal conductive path and that the plug is externally accessible from the movable barrier operator also as recited in claim 10. To the contrary, Petkovsek teaches that any isolation device is separate from and positioned outside of any device for which the Petkovsek system will supply power. Moreover, no plugs are used in the Petkovsek system. As for Peplinski, an isolation device is not even described, let alone a conductive path including an isolation device within a movable barrier operator. Moreover, no plugs are used in Peplinski that attach to a conductive path as claimed.

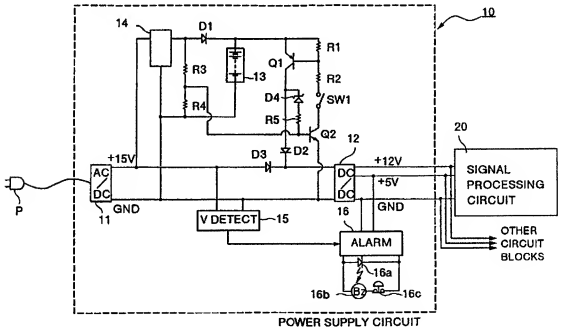
The positioning of the isolation device within a movable barrier operator as claimed by the Applicants is not a simple design choice. Instead, this positioning allows the movable barrier operator to be a modular component that can be used in numerous and varied environments without the requirement of providing further isolation devices external to the operator. Similarly, the placement of the recited plug structure within the movable barrier operator as recited in the amended claims allows the operator to be utilized with numerous, external battery control circuits thereby expanding the potential applications and environments where the operator can be used.

Consequently, since at least one element of claim 10 is not taught or suggested by the references, it is submitted that claim 10 is allowable. The remaining claims depend directly or indirectly upon claim 10. Since claim 10 is allowable, it is submitted that these dependent claims are also allowable.

(2) Claims 2-8 and 10-11 are not rendered obvious by Petkovsek, Peplinski and Kamioka

Petkovsek and Peplinski have been described above and Kamioka does not remedy the deficiencies of these two references. As for Kamioka, a power supply circuit is described. As shown in FIG. 2 of Kamioka, reproduced below for the convenience of the Examiner, charging circuit 14 trickle charges the battery 13 through the diode D1. When external AC power is not being applied to the circuit 10, the discharging circuit of the battery is supplied to the converter 12 via the transistor Q1 and diode D2.

FIG.2



None of the references teaches or suggests a movable barrier operator that includes an internal conductive path that is connected to the DC voltage supply and that this conductive path includes a unidirectional isolation device and an impedance element as recited in claim 10. Further, none of the references teaches or suggests that the movable barrier operator includes a first mating portion of a plug that is coupled to the internal conductive path and that the plug is externally accessible from the movable barrier operator also as recited in claim 10. The deficiencies of Petkovsek and Peplinski have been discussed above. As for Kamioka, any diodes are external to any device to which the Kamioka system supplies power. Additionally, no plug is coupled directly to a conductive path in the Kamioka system.

Consequently, since at least one element of claim 10 is not taught or suggested by the references, it is submitted that claim 10 is allowable. The remaining claims depend directly or indirectly upon claim 10. Since claim 10 is allowable, it is submitted that these dependent claims are allowable.

(3) Claims 2-8 and 10-11 are not rendered obvious by Petkovsek, Peplinski, and Lucas

Petkovsek and Peplinski have been described above and Lucas does not remedy the deficiencies of these two references. More specifically, Lucas describes a battery transfer circuit. As shown in FIG. 2 of Lucas, reproduced below for the convenience of the Examiner, a regulator circuit 18 supplies charging power to a battery 20. The battery 20 is connected to an external electronic device 22. When power failure occurs, the voltage from the battery is applied to the external electronic device 22 via a diode 26. The diode 26 is not part of the external electronic device.

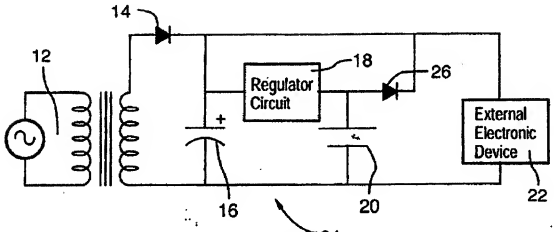


FIG.2 (PRIOR ART)

None of the references teaches or suggests a movable barrier operator that includes an internal conductive path connected to the DC voltage supply and that this conductive path includes a unidirectional isolation device and an impedance element all as recited in claim 10. Further, none of the references teaches or suggests that the movable barrier operator includes a first mating portion of a plug that is coupled to the internal conductive path and that the plug is externally accessible from the movable barrier operator also as recited in claim 10. The deficiencies of Petkovsek and Peplinski have been discussed above. As for Lucas, the diode 26 is taught to be positioned outside of the external electronic device 22, not within the external electronic device 22. Moreover, no plugs are coupled to any conductive path in the Lucas system.

Consequently, since at least one element of claim 10 is not taught or suggested by the references, it is submitted that claim 10 is allowable. The remaining claims depend directly or indirectly upon claim 10. Since claim 10 is allowable, it is submitted that these dependent claims are also allowable.

(4) Claim 9 is not rendered obvious by Petkovsek, Peplinski and Furst

Claim 9 depends upon claim 10 and has been cancelled.

(5) The New Claims are Allowable

New claims 12-15 have been added. Claims 12-14 depend upon claim 10. Since claim 10 is allowable for the reasons stated above, it is submitted that these new claims are allowable for these same reasons. Claim 15 has recitations similar to claim 10 and is submitted to be allowable for the same reasons as claim 10.

IV. Conclusion

The Commissioner is hereby authorized to charge any additional fees which may be required in this application to Deposit Account No. 06-1135.

Respectfully submitted,

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